

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE
INNOVATION

Plaintiff,

vs.

MAURA HEALEY, ATTORNEY GENERAL
OF THE COMMONWEALTH OF
MASSACHUSETTS in her official capacity,

Defendant.

C.A. No. 1:20-cv-12090-DPW

[PLAINTIFF'S PROPOSED] SCHEDULING ORDER

The Court hereby sets the following schedule for further proceedings in this Action:

1. Plaintiff shall have until September 22, 2022 to serve on the Attorney General the Plaintiff's views on the proper interpretation of the Data Access Law.
2. The parties shall thereafter confer on the interpretation issues.
3. On or before October 14, 2022, the parties shall submit a single document to the Court on the interpretation of the Data Access Law, identifying any areas of agreement, and for each area of disagreement, stating each Party's proposed interpretation. Each Party may, at the same time, separately submit a brief explaining its proposed interpretation(s) in further detail.
4. On or before October 31, 2022, each Party shall file sworn affidavits identifying the efforts, if any, made to implement the requirements of the Data Access Law.
5. If either Party determines that further information is required, they shall have until November 30, 2022 to conduct depositions of the other side's affiants.

6. The Parties shall have until December 20, 2022 to submit any further briefing to the Court.

SO ORDERED on this _____ day of September, 2022.

Hon. Douglas P. Woodlock
United States District Court Judge